

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

July 13, 1995

Ms. Melissa McAfee  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle, WA. 98101-2038

Re: Notice of Violation #33756 and 33757

Dear Ms. McAfee,

The Notice of Violation #33756 and #33757 issued July 3, 1995 requires a report from Ash Grove on proposed actions to be taken to achieve continuous compliance.

**NOV #33756**

This event which occurred on June 29, 1995 is a condition of process start up which has been addressed by a Best Available Control Technology (BACT) Determination submitted to PSAPCA on April 27, 1995.

**NOV #33757**

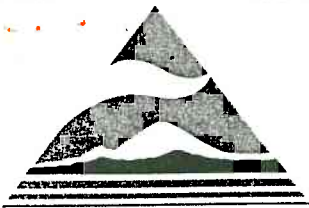
This NOV adds sections 9.15(a) and 9.15(c) to NOV #33290 issued for a June 22, 1995 event. A response was provided to PSAPCA on June 28, 1995 and explained this event as a condition of process start up which has been addressed by a Best Available Control Technology (BACT) Determination submitted to PSAPCA on April 27, 1995.

Ash Grove awaits a response from PSAPCA on the BACT study.

Sincerely, yours,

Gerald J. Brown  
Manager, Safety and Environment

Copy: ESP  
NAF  
HES



*Ed  
Received Today by Mail*

PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    ▲    KITSAP COUNTY    ▲    PIERCE COUNTY    ▲    SNOHOMISH COUNTY

July 3, 1995

Gerald Brown  
Ash Grove Cement Co.  
3801 E. Marginal Way S.  
Seattle, WA 98134

RECEIVED

JUL - 5 1995

AGCW-SEATTLE

Dear Mr. Brown;

Enclosed are Notices of Violations No. 33756 and 33757. NOV No. 33756 is being issued for the emissions observed June 29, 1995 as we discussed per phone. In addition to NOV No. 33290 for the June 22, 1995 incident, NOV No. 33757 adds Sections 9.15(a) and 9.15(c) for the emissions observed.

Please feel free to call me at 689-4056 if you have any questions.

Sincerely,

Melissa McAfee  
Air Pollution Inspector

cc: Elizabeth M. Gilpin, PSAPCA  
Rosemary G. Busterna, PSAPCA  
Fred L. Austin, PSAPCA

MM\cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County  
Janet Chalupnik, Member at Large  
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton  
R.C. Johnson, Councilman, Snohomish County  
Gary Locke, King County Executive

Harold G. Moss, Mayor, Tacoma  
Norman B. Rice, Mayor, Seattle  
Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038    ▲    (206) 343-8800    ▲    (800) 552-3565    ▲

FAX: (206) 343-7522

AGCS2M000366

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PUGET SOUND AIR POLLUTION CONTROL AGENCY JUL - 5 1995  
110 Union Street, Suite 500, Seattle, Washington 98101-2038  
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339  
Cert. Mail No. \_\_\_\_\_

AGCW-SEATTLE  
No. 33757

# NOTICE OF VIOLATION

Date of Violation: 6-22, 19 95 at 8:54a .m.

Name <u>Ash Grove Cement Company</u>		Responsible Person, Title <u>Gerald Brown, Safety and Environmental Manager</u>	
Location of Violation (Address) <u>3801 E. Marginal Wy. S.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>3801 E. Marginal Wy. S.</u>	City, State <u>Seattle, WA</u>	Zip <u>98134</u>	Phone <u>623-5596</u>

## DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 6.09(b) Failure to meet conditions of an Order of Approval.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.04 Particulate matter deposited in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☒ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Operation of vehicle on paved public roadway with dirt/mud/debris on undercarriage (track out) or load spillage.
- ☒ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Section \_\_\_\_\_
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION Causing or allowing emissions from the top of the clinker cooler end of the kiln. (at shroud over cooling).

## CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By MMc Ghee

7/3/95 1030  
Date/Time

Received By \_\_\_\_\_

Signing this Notice is not an admission of guilt

Chc 7/3/95

RECEIVED

6/30/95  
7/3

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Cert. Mail No. \_\_\_\_\_

WUL - 5 1995

AGCW-SEATTLE No. 33756

NOTICE OF VIOLATION

Date of Violation: 6-29, 19 95 at 8:19 a.m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Gerald Brown, Safety/Environment Manager</u>	
Location of Violation (Address) <u>3801 E. Marginal Way S.</u>		City <u>Seattle</u>	Zip <u>98134</u>
Mailing Address <u>3801 E. Marginal Way S.</u>		City, State <u>Seattle, WA</u>	Phone <u>623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 6.09(b) Failure to meet conditions of an Order of Approval.
- ☒ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.04 Particulate matter deposited in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☒ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Operation of vehicle on paved public roadway with dirt/mud/debris on undercarriage (track out) or load spillage.
- ☒ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Section \_\_\_\_\_
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION Causing or allowing emissions greater than 20% opacity for over 3 minutes in 1 hour from the top of the clinker cooler end of the kiln. (at shroud over cooling).

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By mmcafee  
Form No. 70-119 (Revised 9/93)

6/30/95 1330  
Date/Time  
(WY 7/3/95)

Received By \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M000368